United States District Court
Southern District of Texas
FILED

DEC 0 9 2015

David J. Bradley, Clerk of Court

to such laws.

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

| UNITED STATES OF AMERICA,         | §<br>§                                     |
|-----------------------------------|--------------------------------------------|
| v.                                | §<br>§Criminal Action No.: H-4:15-cr-<br>§ |
| MARTINA AZUCENA MELENDREZ ACEVES, | §                                          |
| a/k/a AZUCENA MELENDREZ, a/k/a    | § 45 (D) 45 (                              |
| AZUCENA MELENDEZ,                 | § 15 CR 652                                |
|                                   | §                                          |
| Defendant.                        | §                                          |

## **INDICTMENT**

THE GRAND JURY CHARGES THAT:

## **COUNT ONE**

On or about June 25, 2014, in the Houston Division of the Southern District of Texas,

MARTINA AZUCENA MELENDREZ ACEVES, a/k/a AZUCENA MELENDREZ, a/k/a

AZUCENA MELENDEZ, the defendant herein, willfully and knowingly made a false statement in the application for a United States passport, namely, purporting to be Martha Aceves, with the intent to induce and secure the issuance of a passport under the authority of the United States of America, contrary to the laws regulating the issuance of passports and rules prescribed pursuant

In violation of 18 United States Code, Section 1542.

## **COUNT TWO**

(AGGRAVATED IDENTITY THEFT – 18 U.S.C. § 1028A)

From on or about June 26,2,14, in the Houston Division of the Southern District of Texas, MARTINA AZUCENA MELENDREZ ACEVES, a/k/a AZUCENA MELENDREZ,

a/k/a AZUCENA MELENDEZ, the defendant herein, did knowingly possess and use without lawful authority a means of identification of another person, to-wit, the name, date of birth, place of birth, and birth record of M.A., during and in relation to a violation of Title 18, United States Code, Section 911 (Misrepresentation of Citizenship) and Title 18, United States Code, Section 1542 (False Statement in Passport Application).

In violation of 18 United States Code, Section 1028A.

## **COUNT THREE**

(MISREPRESENTATION OF CITIZENSHIP – 18 U.S.C. § 911)

From on or about June 26, 2014, in the Houston Division of the Southern District of Texas, MARTINA AZUCENA MELENDREZ ACEVES, a/k/a AZUCENA MELENDREZ, a/k/a AZUCENA MELENDEZ, the defendant herein, a native and citizen of Mexico, and an alien in the United States, did falsely and willfully represent herself to be a citizen of the United States in a passport application.

In violation of Title 18, United States Code, Section 911.

A TRUE BILL:

ORIGINAL SIGNATURE ON FILE

FOREPERSON OF THE GRAND JURY

KENNETH MAGIDSON

United States Attorney, Southern District of Texas

Adam Laurence Goldman

Assistant United States Attorney